

**Kaufman
Lieb
Lebowitz &
Frick**
attorneys at law

(212) 660-2332
18 E. 48th St., Suite 802
New York, NY 10017
www.kllf-law.com

July 18, 2023

By ECF

Hon. Naomi Reice Buchwald
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Application granted. Final extension.

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York

Re: *Ingram v. City of New York et al.*, 21 Civ. 09050

July 19, 2023

Dear Judge Buchwald:

This firm represents Plaintiff Derrick Ingram in this action. We write jointly with counsel for Defendants to seek an extension of fact discovery deadlines by 30 days. This is the parties' fourth extension request. The Court granted the parties' previous discovery extension requests.

Both parties have produced thousands of pages in discovery and have begun taking depositions, with nine remaining depositions noticed. Although most of the depositions are scheduled for July and August, the parties have encountered difficulties in scheduling the last few depositions, given vacation schedules of parties and witnesses during the summer months, in addition to an upcoming trial on part of defense counsel (set to begin on July 31, bearing Docket Number 16-CV-4731 (VEC) (GWG) (S.D.N.Y.)). The parties believe a 30-day extension of fact discovery deadlines would provide adequate time to finalize discovery and complete the remaining depositions.

The requested new deadlines are as follows:

- Deadline for non-expert discovery requests – August 19, 2023
- Deadline to advise the Court re: the necessity of an expert discovery schedule – September 22, 2023
- Deadline for fact discovery – September 29, 2023

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Alyssa Isidoridy

Alyssa Isidoridy

CC. All counsel (via ECF)

Alanna Kaufman* • Douglas E. Lieb† • David A. Lebowitz • Alison Frick*

Alyssa Isidoridy • Samuel Barr

*Also admitted to practice in New Jersey †Also admitted to practice in California and Connecticut